

**N THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN THE BANKRUPTCY MATTER OF:

Shelia L. Martin

Debtor(s)

Chapter 13 No. 09-42237

Judge Jacqueline P. Cox

**NOTICE OF MOTION FOR LEAVE TO ENTER INTO LOAN MODIFICATION AND FOR  
COURT APPROVAL OF SAID MODIFICATION AGREEMENT**

To: See attached Service List

PLEASE TAKE NOTICE that on 12/5/2011 at 9:00 AM, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Jacqueline P. Cox in Room 619, Dirksen Federal Building, 219 S. Dearborn, Chicago, IL 60604, and present the attached motion, at which time and place you may appear if you wish.

/s/Susan J. Notarius  
Susan J. Notarius

**PROOF OF SERVICE**

I, the undersigned, an attorney, certify that I served the attached service list by regular mail at the address above, and Robert J. Semrad & Associates and Thomas Vaughn through the Court ECF system on or before November 22, 2011.

/s/Susan J. Notarius  
Susan J. Notarius

Susan J. Notarius, ARDC # 06209646  
Kluever and Platt, LLC  
65 E. Wacker Pl., Ste. 2300  
Chicago, IL 60601  
312/201-6727

**THIS OFFICE IS ATTEMPTING TO COLLECT A DEBT  
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE**

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American Home Mortgage Servicing, Inc., Wells Fargo Bank, N.A., as Trustee for Option One Mortgage Loan Trust 2006-3, Asset-Backed Certificates, Series 2006-3 (“Movant”), through its attorney Kluever & Platt, LLC, and states as follows:

1. Movant holds a security interest in, by virtue of a mortgage on, the property located at 19921 Chestnut Court, Lynwood, IL.
2. Movant and Debtor seek leave of Court to enter into the attached Loan Modification Agreement (“Agreement”) and for approval of the terms of the Agreement.
3. The Agreement capitalizes the advances and delinquent amounts and reduces the interest rate to an initial rate of two percent (2%) for the first five years and in steps thereafter pursuant to the attached schedule.
4. The Agreement has a final balloon payment for the loan balance on September 1, 2036.

WHEREFORE, Movant requests this that the Court enter an Order:

1. Granting Debtor and AHMSI leave to enter into the loan Modification;
2. Approving the Terms of the Modification Agreement; and

3. For such other and further relief as the Court deems just and proper.

/s/Susan J. Notarius  
Susan J. Notarius

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